

This document explains how we use your personal data.

Schloetter Company Limited is a private limited company registered in England and Wales. Schloetter is the data controller in respect to all personal data collected by it.

We are committed to ensuring the privacy of our suppliers, customers, clients and website visitors. In this policy we explain how we hold, process and retain your personal data.

## **1. HOW WE USE YOUR PERSONAL DATA**

1.1 This section provides you with information about:

- (a) what personal data we hold and process;
- (b) in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- (c) the purposes for which we may process your personal data; and
- (d) the legal grounds on which we process your data.

We will not pass on your information to any third party without your explicit consent.

1.2 **Contact data / Enquiry data.** We may process contact details that you provide to us ("**contact data**"). This contact data may include your name and email address and possibly your postal address and telephone and may be provided through our website.

The legal basis for this processing is our legitimate interest in responding to your enquiries and ensuring the efficient administration and continued function of our website.

1.3 **Sensitive Personal Data.** During the course of using our services, you may provide us with sensitive information about yourself ("**sensitive data**"). However, we will only process this sensitive data if you consent to us doing so.

1.4 **Transaction data.** We may process information relating to any payments made by you to us ("**transaction data**"). The transaction data may include your contact details, your bank account details, and the transaction details. The transaction data may be processed for the purposes of processing these payments and keeping proper records of those transactions.

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our business and website.

- 1.5 **Website data.** We may process data about your use of our website and services ("**website data**"). The website data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the website data is our analytics tracking system. This website data may be processed for the purposes of analysing the use of the website and services.

The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 1.6 **Notification data.** We may process information that you provide to us for the purpose of subscribing to our newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you newsletters.

The legal basis for this processing is consent.

- 1.7 **Correspondence data.** We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 1.8 **Other processing activities.** In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 2. PROVIDING YOUR PERSONAL DATA TO OTHERS

- 2.1 **Our partner service providers.** We may share your data to our partners who manage and support us. We may use third party service providers to help us operate our business and our web site or administer activities on our behalf. We may share your information with these third parties for those limited purposes provided that you have given us your permission.
- 2.2 **Our professional advisers.** We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice and managing legal disputes.
- 2.3 **Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.
- 2.4 **To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

### 3. RETAINING AND DELETING PERSONAL DATA

- 3.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 3.2 Unless we contact you and obtain your consent for us to retain your personal data for a longer period, we will retain and delete your personal data as follows:
  - (a) Contact data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
  - (b) Sensitive data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
  - (c) Transaction data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
  - (d) Website data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

- (e) Notification data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
- (f) Correspondence data will be retained for up to 3 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

3.3 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **4. AMENDMENTS**

- 4.1 We may update this policy from time to time by publishing a new version on our website.
- 4.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 4.3 We may notify you of changes to this policy by email.

#### **5. YOUR RIGHTS**

- 5.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - (a) your request not being found to be unfounded or excessive, in which case a charge may apply; and
  - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 5.2 We may withhold personal information that you request to the extent permitted by law.
- 5.3 The rights you have under data protection law are:
  - (a) the right to access;
  - (b) the right to rectification;

- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

5.4 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.

5.5 **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.

5.6 **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.

5.7 **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal

data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

**5.8 Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

**5.9 Your right to object to direct marketing.**

You may instruct us at any time not to process your personal information for marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

**5.10 Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

**5.11 Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

- 5.12 **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 5.13 **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 5.14 **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

## 6. COOKIE POLICY

- 6.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 6.2 We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 6.3 Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.
- 6.4 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## 7. OUR DETAILS

- 7.1 This website is owned and operated by Schloetter Company Limited.

7.2 We are a private limited company registered in England and Wales with company registration number 00947371 and registered address at Abbey Works, New Road, Pershore, Worcester, WR10 1BY.

7.3 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.